

Pipeshed Source Control Decision Criteria For Portland Harbor

Discussion Draft March 2008

Investigations for a given outfall basin will be considered complete, and a Source Control Decision (SCD) made, when a comprehensive pipeshed *Source Control Evaluation Report* has been completed by BES and DEQ on a per outfall basis. A formal risk assessment is not anticipated. The Report should cover the following considerations:

1) Investigation and Source Control Evaluation

Source Control Evaluation Report has documented:

- a) The basin characteristics (physical data);
- b) The need for stormwater source control, based on the presence of contaminants of concern that exceed JSCS screening level values or other risk-based criteria for in-water sediment data, inline sediment data, sediment traps, etc., and including stormwater analyses from an outfall (unless determined to be unnecessary for a low priority basin);
- c) Where source control is needed within a basin, based on land use, in-line sediment data, site-specific data, site discovery work; and
- d) To what extent source control is needed both in terms of priority (e.g., high, medium, or low priority) and the likely level of effort (e.g., best management practices, site-specific cleanup measures such as soil removal, end-of-pipe treatment, etc.);
 - o Whether contamination at sites is related to historic releases that impacted soil or groundwater (i.e., Cleanup issues), or
 - o Whether contamination at sites is related to ongoing facility operational practices and/or discharges consistent with land use (i.e., WQ/City permit issues)
 - o *May need to make a determination of “ambient” stormwater sediment contaminant loading using stormwater and solids data from City monitoring, literature values, compiled individual site analyses, and via the LWG Round 3a sampling data.*

2) Source Control Measures

Source Control Evaluation Report documents measures and BMPs identified and implemented on a site-specific or within a basin that are likely to reduce contaminants in discharge (e.g., cleanouts and BMPs). Measures taken are based on feasibility of the application of the BMPs relative to exceedances, currently identified based on JSCS SLVs, and comparison to alternatives.

For the pipeshed, report details the evaluation and implementation any non-site specific actions that could be taken to control discharges such as individual and

system wide line cleanouts and repairs, other actions that reduce or divert discharges. Should include alternatives similar to those presented in Columbia Slough Watershed Action Plan, Section 4.4).

3) Source Control Decision

The *Source Control Evaluation Report* should recommend a SCD that is supported by the information presented above. This would be the basis for a Source Control Decision document prepared by DEQ for EPA's review. A City Outfall Project Record of Decision may be applicable either basin by basin or for all basins within ISA, once outfall RIs and SCDs have been completed and LTM and adaptive management strategies are established.

Examples:

- High priority basin – Cleanup sites within the basin are ongoing sources but are being addressed through DEQ oversight, the need for a PH permit has been evaluated to address ongoing facility practices (e.g., Gunderson, Willbridge) and/or the need for end-of-pipe treatment has been determined.
- Medium priority basin – Weight of evidence, interim source control measures implemented at sites but long-term monitoring required to evaluate effectiveness and need for any follow-up actions
- Low priority basin – No action (e.g., contaminant concentrations at the outfall are low relative to JSCS and consistent with land use)

4) Implementation of Source Control Measures, Adaptive Management, and Long Term Monitoring Plan (LTM)

The *Source Control Evaluation Report* should document that source control actions for historic releases and associated current migration pathways are implemented, site-specific effectiveness sampling/monitoring are ongoing, and outfall basin effectiveness sampling/monitoring is being conducted within the context of a Long Term Monitoring and Adaptive Management plan (AMP).

Report should identify requirements and format of a long term monitoring plan (should resemble Columbia Slough Watershed Action Plan; or, be part of an administrative modification to the 1200z or MS4 permits. The Evaluation Report should consider calibrating LTMP requirements with priority of basin (ie, lower priority basins could have less rigorous requirements than high priority basins), and identify role of a permit, various DEQ and BES permit programs, and the DEQ CU program in meeting objectives of LTMP and AMP.

5) Source Control Determinations

Final Outfall SCDs, made by EPA/DEQ, only after PH ROD is signed and applicable source control measures are proven to be effective. An Interim SCD may consist of both a determination that interim actions are complete, and be coupled with a longer term administrative framework (permit based) to deal with perpetual discharges (mainly non-legacy).